

# EXHIBIT O

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LINDA JANN LEWIS, MADISON LEE,  
ELLEN SWEETS, BENNY ALEXANDER,  
GEORGE MORGAN, VOTO LATINO,  
TEXAS STATE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
and TEXAS ALLIANCE FOR RETIRED  
AMERICANS,

Plaintiffs,

vs.

RUTH HUGHS, in her official capacity as  
Texas Secretary of State,

Defendant.

Civil Action No. 5:20-cv-00577

Related to *Gloria et al. v. Hughs et al.*,  
No. 5:20-cv-00527

**DECLARATION OF JUDY BRYANT IN SUPPORT OF PLAINTIFFS' MOTION**

Pursuant to 20 U.S.C. § 1746, I, Judy Bryant, declare as follows:

1. My name is Judy Bryant. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.
2. I am currently the Field Organizer for Texas Alliance for Retired Americans ("TARA"). TARA is incorporated in Texas as a 501(c)(4) nonprofit, social welfare organization. It is a chartered state affiliate of the Alliance for Retired Americans.
3. TARA has more than 145,000 members, comprised of retirees from public and private sector unions, community organizations, and individual activists from every county in Texas. Most of our members are between 65 and 85 years of age. TARA also has many members with disabilities.

4. TARA's mission is to ensure social and economic justice and full civil rights that retirees have earned after a lifetime of work. It accomplishes this mission by actively pursuing and promoting legislation and public policies that are in the best interest of current and future retired Texans. TARA also accomplishes its mission by ensuring that its members actively participate in and vote in Texas's elections. Because a significant percentage of Texas's elections are decided by close margins, it is essential that TARA's members are able to effectively exercise their right to vote. To ensure that our members can make their voices heard in Texas elections, TARA traditionally engages in get-out-the-vote (GOTV) efforts. These GOTV efforts traditionally consist of making phone calls to members and knocking on doors to encourage members to vote. When we call our members in advance of an election, we encourage them to vote, and try to assist our members in navigating the voting process if they need help.

5. The outbreak of the COVID-19 pandemic has affected how TARA allocates its resources to encourage voting. Because nearly all of TARA's members are of an age that place them at a heightened risk of complications from coronavirus, our members are overwhelmingly likely to vote by mail this year instead of voting in person. I understand from talking to TARA members and other political organizers in the state that many more people are voting by mail this year when compared to other years. Thus, TARA has redirected much of its time and resources to efforts in educating voters on how to apply to vote by mail and how to successfully cast a mail-in ballot. These efforts include the creation of a special vote-by-mail committee that meets weekly to coordinate statewide outreach, phone-banking to make direct contact with Texas voters over the age of 65, and lobbying state officials to ease the restrictions on voting by mail. TARA also holds socially distanced events, such as the upcoming car caravan to publicize the need to vote by mail in the 2020 general election.

6. TARA educates voters not just on how to apply to vote by mail, but also about how to increase the likelihood of having their mail-in ballots counted. This is because Texas's Postage Tax, Ballot Receipt Deadline, Signature Match Requirement, and Voter Assistance Ban (together, "Challenged Provisions") all make it more difficult for TARA's members and other vulnerable people to vote and to have their votes counted. TARA members are, for example, voters who are likely to face difficulty acquiring postage or delivering a mail ballot themselves should they be unable to return it through the mail in sufficient time for their ballot to be counted. For the countless TARA members who are immunocompromised or have a disability that prevents them from easily leaving the home, venturing out to acquire postage to mail their ballot or to deliver their ballot in person is at best, dangerous, and at worst, simply impossible. Relatedly, the many TARA members who will need to cast their ballot by mail in upcoming elections to avoid severe illness are at substantial risk of not having their mail-in ballots counted if they do not arrive by the Ballot Receipt Deadline. While thousands of TARA's members are burdened by the Challenged Provisions, the organization has specifically identified one member, a named plaintiff in this case, who will be burdened by the Challenged Provisions in upcoming elections: George "Eddie" Morgan.

7. The Challenged Provisions frustrate TARA's mission because they deprive individual members of the right to vote and to have their votes counted, threaten the electoral prospects of TARA-endorsed candidates whose supporters will face greater obstacles casting a vote and having their votes counted, and make it more difficult for TARA and its members to associate to effectively further their shared political purposes.

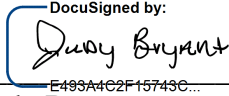
8. The Challenge Provisions also diminish the electoral prospects of TARA's endorsed candidates. TARA has already endorsed several candidates for state office and will

endorse additional state and federal candidates after the July runoff election. These candidates will be less likely to win if the mail-in votes of their supporters go uncounted because of the Challenged Provisions.

9. Because of the increased burdens on mail-in voting created by the Challenged Provisions, TARA will be required to divert time and resources to educating members about these requirements and assisting them in complying so that their mail-in ballots are received, accepted, and counted. However, TARA does not have limitless resources. Efforts to ensure members are not disenfranchised by the Challenged Provisions will reduce TARA's time and resources that would otherwise go to educating members on critical public policy issues, including the pricing of prescription drugs and the expansion of Medicare and Medicaid benefits, among many other of our priorities. Our efforts to ensure our members are not disenfranchised by the Challenged Provisions will also reduce the time and resources available to track and monitor legislation that threatens Texas's seniors, work that we view as critical to our organization. Finally, our efforts to educate voters about the Challenged Provisions has required us to divert resources from registering Texas voters.

10. In sum, the Challenged Provisions make it harder for TARA to realize its mission and for TARA's members to vote and have their votes counted.

DATED: June 17, 2020

By:  E493A4C2F15743C...  
Judy Bryant  
Field Organizer  
Texas Alliance for Retired Americans